

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION

IN RE

DAVID MICHAEL MOBLEY,  
DEBTOR

§  
§  
§  
§

CASE NO. 22-60004  
CHAPTER 11

**TEXAS CHAMPION BANK'S JOINDER IN QUALITY'S  
MOTION TO CONVERT CASE TO CHAPTER 7 OR, IN THE  
ALTERNATIVE, TO APPOINT A CHAPTER 11 TRUSTEE OR EXAMINER**

Texas Champion Bank is an unsecured creditor in Debtor's bankruptcy proceeding, evidenced by Proof of Claim No. 35. Texas Champion Bank hereby joins and incorporates the arguments and assertions in Quality's Motion to Convert Case to Chapter 7 or, in the Alternative, to Appoint a Chapter 11 Trustee or Examiner, filed on September 15, 2022, at Doc. #137.

For the reasons stated in Quality's Motion to Convert, the court should grant Quality's Motion and convert the case to a Chapter 7 or, in the alternative, appoint a Chapter 11 Trustee or Examiner. Texas Champion Bank believes that such action would be in the best interest of the creditors, and the bankruptcy estate, and respectfully requests the court grant Quality's Motion.

Respectfully submitted,



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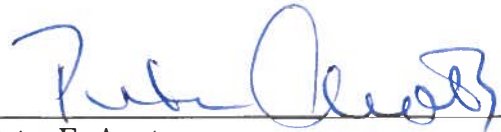
(361) 888-9201

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ATTORNEY FOR TEXAS CHAMPION  
BANK

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing document was served on the parties receiving notice by ECF on the 12<sup>th</sup> day of October, 2022:

  
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Peter E. Avots